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POSTAL REGULATORY
COMMISSION

January 30, 2020

Postal Regulatory Commission
901 New York Avenue NW, Suite 200
Washington, DC 20268

RE: Docket Number: RM2017-3

Dear Commissioners:

I am writing on behalf of American Farmland Trust (AFT) and our 50,000 supporting members in response to your proposal as a part of the Ten-Year Rate Review process to remove the Consumer Price Index (CPI) cap that now governs postage rates. The new formula proposed represent potential volatile postage price hikes that range from 28% - 40% or more over the next five years. We strenuously oppose this action and strongly urge you to reconsider this decision.

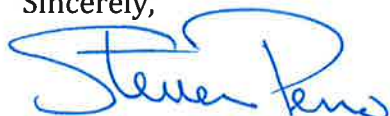
American Farmland Trust launched the conservation agriculture movement in 1980 and for the past forty years has helped save the land that sustains our country by protecting agricultural land, promoting environmentally sound farming practices, and keeping farmers on the land. As a nonprofit mailer, direct mail is a critical component of our fundraising program. Last year, direct mail generated nearly 50% of our total fundraising revenue. Direct mail allows us to not only raise revenue, but also educate people on the critical importance of protecting our country's farmland and ranchland.

We believe the instability in postage costs presents an opportunity for our program to become overwhelmed and unsustainable. We have invested time and money to develop a mail fundraising program that meets current standards, is fiscally sound and is prepared for modest price increases. Annually, our organization spends more than \$500,000 on postage. We have relied on the Postal Service's CPI capped rate increases to balance our fundraising budget and to plan for stability in the future. The sudden rate hikes that this rule change could represent would cripple our mailing programs. The USPS says it is our partner, but springing a wholesale and drastic change such as contemplated here does not demonstrate collaboration.

In the short run, and most likely the long run, we would suffer substantial lost revenue and a consequential loss of resources for our programs and those we serve. With a potential reduction in direct mail revenue, AFT would be forced to curtail some of our programs, which include, but are not limited to: our initiative that provides opportunities for farmers to bring healthy foods into schools and hospitals; our program that helps new farmers find land and retiring farmers keep their land in agriculture; trainings that enhance the skills of new farmers or promote the adoption of regenerative farming practices; and our Women for the Land initiative that engages and empowers women land owners.

Unpredictable rate increases would lead to a further migration from mail to alternative means of fundraising and membership development. In terms of our fundraising mix, hard-copy USPS mail outperforms many digital options. Direct mail is a powerful fundraising tool, and we want to continue to utilize this tool in the future. We, like other nonprofit mailers, have long relied on our partnership with the Postal Service. We urge you to justify our reliance by declining to move this proposal any further.

Sincerely,

A handwritten signature in blue ink that reads "Steven Peno". The signature is fluid and cursive, with the first name "Steven" and last name "Peno" clearly legible.

Steven Peno

Director of Annual Giving